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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

14 IN RE: UBER TECHNOLOGIES, INC.,
15 PASSENGER SEXUAL ASSAULT
LITIGATION

MDL No. 3084 CRB

**NOTICE OF MOTION AND MOTION TO
WITHDRAW AS COUNSEL FOR
PLAINTIFF H.L.**

17 This Document Relates to:

Honorable Charles R. Brever

18 *H.L. v. Uber Technologies, Inc., et al;*
3:24-cv-04526-CRB

**NOTICE OF MOTION AND MOTION TO WITHDRAW AS COUNSEL FOR
PLAINTIFF H.J.**

21 TO ALL PARTIES AND THEIR COUNSEL OF RECORD, PLEASE TAKE NOTICE
22 that as soon hereafter as the matter may be heard, Peiffer Wolf Carr Kane Conway and Wise,
23 LLP (“Peiffer Wolf”), counsel of record for Plaintiff H.L. (“Plaintiff”), moves this Court for an
24 order permitting its withdrawal as counsel for Plaintiff.

25 This Motion is made pursuant to Local Rule 11-5(a) and C. This Notice of Motion &
26 Motion is based on the below Memorandum in Support and the accompanying Declaration of
27 Rachel B. Abrams (“Decl.”), attached hereto as Exhibit A. A Proposed Order is attached as
28 Exhibit B.

1 **MEMORANDUM IN SUPPORT OF MOTION TO WITHDRAW AS COUNSEL**

2 Pursuant to Local Civil Rule 11-5(a) and California Rules of Professional Conduct
 3 1.16(b)(4) and 1.16(d), Peiffer Wolf submits this Memorandum of Law in support of its Motion
 4 to Withdraw as Counsel for Plaintiff H.L. Peiffer Wolf respectfully requests the Court grant the
 5 Motion.

6 **STATEMENT OF FACTS**

7 Peiffer Wolf should be permitted to withdraw as counsel for Plaintiff. An attorney may
 8 withdraw from a case by obtaining an order from the court after reasonable advance written
 9 notice has been provided to the client and to all other parties. Civ. L.R. 11-5(a); *see also* Cal.
 10 Rules Prof. Conduct 1.16(d)(1).

11 Peiffer Wolf has given appropriate advance notice of its intent to withdraw to Plaintiff
 12 beginning on July 25, 2025 and culminating with final notice on August 1, 2025. Decl. ¶ 5(k).
 13 Peiffer Wolf has also given Uber advance notice. Decl. ¶ 7. Peiffer Wolf has taken all possible
 14 steps to avoid prejudice to Plaintiff by explaining to her the possible consequences of failing to
 15 contact Peiffer Wolf or meet discovery deadlines. Decl. ¶¶ 5-6. Peiffer Wolf also submitted the
 16 limited information Peiffer Wolf did have. Decl. ¶ 5. Despite those efforts, Plaintiff failed to
 17 establish useful communication with Peiffer Wolf ¶ 5. Plaintiff also failed to provide Peiffer
 18 Wolf with sufficient or adequate information to confirm her claim ¶ 6. Peiffer Wolf has thus
 19 taken all reasonable steps to avoid foreseeable prejudice to Plaintiff. Decl. ¶ 9.

20 Under California Rule of Professional Conduct 1.16(b)(4), a lawyer may withdraw from
 21 a case if “the client … renders it unreasonably difficult for the lawyer to carry out the
 22 representation effectively.” Here, Plaintiff rendered it unreasonably difficult for Peiffer Wolf to
 23 carry out the representation effectively by failing to communicate with Peiffer Wolf and failing
 24 to provide information required to prosecute her case, despite requests from Peiffer Wolf. Decl.
 25 ¶ 5. Therefore, Peiffer Wolf has been unable to meet discovery deadlines in this case.

26 Because this motion is not accompanied by a substitution of counsel or an agreement by
 27 Plaintiff to proceed *pro se*, Peiffer Wolf agrees to the condition imposed by Local Rule 11-5(b)
 28 to serve Plaintiff with all papers in this matter, unless or until Plaintiff appears *pro se*, other

1 counsel appears on Plaintiff's behalf, or upon further order of the Court. Decl. ¶ 10.

2 **CONCLUSION**

3 Peiffer Wolf respectfully requests that the Court enter an order terminating its
4 representation of Plaintiff and allowing Plaintiff 30 days to retain new counsel.

5 DATED: October 10, 2025

6 RESPECTFULLY SUBMITTED,

7 BY: */S/ RACHEL B. ABRAMS*
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